1 Neelu Pal 606 Post Road E #523 Westport CT 06880 (973)204-4743 3 neelupal@hotmail.com 4 Plaintiff, pro se 5 UNITED STATES DISTRICT COURT OF THE DISTRICT OF NEVADA LAS VEGAS, NEVADA 6 7 NEELU PAL, MD Case No.: 2:20-cv-01257-JAD-DJA 8 Plaintiff, ORDER GRANTING 9 MOTION FOR EXTENSION OF TIME TO vs. RESPOND TO DEFENDANTS' MOTION 10 TO DISMISS AND STAY JACLYN HAFTER, ET. AL., 11 ECF No. 15 Defendants 12 I, Neelu Pal, Plaintiff, respectfully ask the Court for an extension of time to file 13 my response to the Defendants' Motions to Dismiss and to Stay. I make this motion pursuant to 14 15 FRCP 6(b). 16 On August 3, 2020 Defendants filed their simultaneous Answer to Complaint 17 and Motion to Dismiss; Defendants amended this document on August 4, 2020. On or about 18 August 4, 2020 Defendants filed a Motion to Stay. 19 On August 4, 2020 Tropical Storm Isaias made landfall in the New York -20 21 Connecticut area. Plaintiff resides in the New York - Connecticut area. As a result of the 22 tropical storm and accompanying tornadoes, the area sustained severe and extensive damage to 23 the infrastructure including the local electric grids and telephone towers and internet/cable 24 services. There were also widespread road closures due to fallen trees and downed electric 25 poles and electric lines. Plaintiff's residence, property and neighborhood experienced 26 27 significant damage due to fallen and uprooted trees, downed live electric lines and poles, 28 MOTION FOR EXTENSION OF TIME TO RESPOND TO DEFENDANTS' MOTION TO DISMISS AND STAY - 1

continuous electric, internet and telephone services outages lasting for almost seven days, followed by intermittent electric and internet outages continuing until August 20, 2020. To the current day, Plaintiff's home and immediate neighborhood area has experienced, and continues to experience significant damage including fallen and uprooted trees, downed electric poles and lines and road closures for repairs.

As a result of the extensive electric and internet outages and road closures in the entire New York-Connecticut area, Plaintiff was unable to timely obtain the Defendants' Motion documents or prepare any responses, which were due on August 17, 2020. Plaintiff was able to partially download Defendants' Motion documents on August 20, 2020.

Since this delay was a result of circumstances and conditions beyond her control, Plaintiff respectfully requests the Court's permission for an extension of eight days from today, until August 29, 2020 to file her responses to Defendants' Motions to Dismiss and Motion to Stay.

DATE: August 21, 2020



Neelu Pal, MD Plaintiff, pro se

## **ORDER**

Good cause appearing, IT IS HEREBY ORDERED that the motion to extend time [15] to respond to the motions to dismiss and stay [6] [12] is GRANTED. The deadline to respond to the motions to dismiss and stay [6] [12] is extended to 8/29/2020.

U.S. District Judge Jennifer A Dorsey
Dated: September 1, 2020